

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Dragon, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 637-2345; Fax: (702) 946-1345
9 dbrenner@wrightlegal.net
10 ldragon@wrightlegal.net
11 *Attorneys for Plaintiff, Bank of America, N.A.*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 BANK OF AMERICA, N.A.,

11 Plaintiff,

12 vs.

13 NORTH AMERICAN TITLE GROUP, INC.,
14 et al.,

15 Defendants.

Case No.: 2:20-cv-01514-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE A
~~PROPOSED~~ DISCOVERY PLAN**

(Second Request)

16 Plaintiff, Bank of America, N.A. (“BANA”) and Defendant, North American Title
17 Insurance Company (“NATIC”), by and through their respective undersigned counsel, hereby
18 stipulate and agree as follows:

19 This is one of many actions pending before the Nevada state and federal courts involving
20 a lender’s alleged entitlement to coverage under a title insurance policy following an HOA
21 foreclosure sale. After the Complaint was filed, BANA and NATIC entered into global settlement
22 negotiations to discuss the resolution of approximately 100 similar title insurance claims,
23 including this case. The Parties stipulated to stay this case to achieve that purpose and on August
24 21, 2021, this Court entered its Minute Order continuing the stay this case. ECF No. 32. On
25 September 22, 2022, the Parties submitted a Joint Status Report [ECF No. 33], and on September
26 24, 2022, the Court issued a Minute Order requiring that the Parties to file settlement documents,
27 stipulation for dismissal or joint status report within 60 days. ECF No. 34.
28

The Parties submitted a Joint Status Report on November 22, 2022, wherein the Parties advised that the September 29, 2022 mediation was unsuccessful and that the Parties would submit a joint proposed discovery plan by December 22, 2022. ECF No. 36. The deadline was subsequently extended until January 20, 2023. ECF No. 41. While the Parties have held the Fed. R. Civ. P. 26(f) conference, counsel for BANA needs additional time to confer with its client regarding the proposed discovery plan. BANA requests an additional 14-day extension, until February 3, 2023, for the Parties to submit the proposed joint discovery plan. Counsel for NATIC does not oppose the request for an extension. This is the second request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 20th day of January, 2023.

WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Dragon, Esq.

Lindsay D. Dragon, Esq.
Nevada Bar No. 13474
7785 W. Sahara Ave., Suite 200
Las Vegas, Nevada 89117
*Attorneys for Plaintiff, Bank of America,
N.A.*

DATED this 20th day of January, 2023.

SINCLAIR BRAUN LLP

/s/ Kevin S. Sinclair, Esq.

Kevin S. Sinclair, Esq.
Nevada Bar No. 12277
16501 Ventura Blvd, Suite 400
Encino, California 91436
*Attorneys for Defendant, North American Title
Insurance Company*

IT IS SO ORDERED.



Cam Ferenbach
United States Magistrate Judge

DATED 1-20-2023